

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

TAWNE HEDGES,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 20-cv-2301
)	
EMERGENT BUSINESS GROUP, INC.,)	
d/b/a EMERGENT SERVICING,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Defendant, Emergent Business Group, Inc. d/b/a Emergent Servicing (“Emergent”), through its counsel, Gordon Rees Scully Mansukhani, LLP, pursuant to 28 U.S.C. §§ 1331, 1391, 1441, and 1446, hereby give notice of the removal of this lawsuit from the Circuit Court of Cook County, Chancery Division to the United States District Court for the Northern District of Illinois, Eastern Division. In support of this Notice of Removal, Emergent respectfully submits the following:

1. On February 24, 2020, Plaintiff Tawne Hedges (“Plaintiff”) filed an action in the Circuit Court of Cook County, Chancery Division entitled *Tawne Hedges v. Emergent Business Group, Inc., d/b/a Emergent Servicing*, Case No. 2020 CH 02216. Plaintiff served Emergent with a copy of the Complaint on March 12, 2020. True and accurate copies of the Complaint and Proof of Service reflecting the service date are attached as Exhibit A.
2. No other pleadings have been filed, entered, served, or issued at this time.
3. Plaintiff’s Complaint asserts TCPA violations pursuant to 47 U.S.C. § 227 and this Court has original jurisdiction over such action.

4. Pursuant to 28 U.S.C. § 1391(b)(2), venue is proper in the United States District Court for the Northern District of Illinois, Eastern Division, as a substantial part of the alleged events giving rise to the Plaintiff's claims purportedly occurred within this judicial district.

5. Further, pursuant to 28 U.S.C. § 1446(a), this Notice of Removal is properly directed to this Court, as the United States District Court for the Northern District of Illinois, Eastern Division, is the District Court embracing the Circuit Court of Cook County, Illinois, where Plaintiff's Complaint is currently pending.

6. Pursuant to 28 U.S.C. § 1446(b), removal is timely because this Notice is being filed within 30¹ days of March 12, 2020, when Emergent was served with the Complaint.

7. As required by 28 U.S.C. § 1446(d), Emergent has issued written notice of the filing of this Notice of Removal to Tawne Hedges, through his counsel and Emergent has filed this Notice of Removal with the Circuit Court of Cook County.

WHEREFORE, pursuant to 28 U.S.C. §§ 1331, 1391, 1441, and 1446, Defendant Emergent Business Group, Inc. d/b/a Emergent Servicing, respectfully give notice that the above action, now pending against it in the Circuit Court of Cook County, Chancery Division, is removed to the United States District Court for the Northern District of Illinois, Eastern Division.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Avanti D. Bakane
Attorneys for Defendant
Emergent Business Group, Inc.
d/b/a Emergent Servicing

¹ The 30 day computation from service is extended by Rule to April 13, 2020, as 30 days from service fell on a Saturday. Fed. R. Civ. P. 6(a)(1)(C) ("if the last day is a Saturday, Sunday, or legal holiday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday.")

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CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2020, a copy of the foregoing document was electronically filed and served to counsel of record via the Court's CM/ECF PACER System and U.S. Mail as follows:

Daniel Edelman
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& Goodwin, LLC
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By: /s/ Avanti D. Bakane